

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 19-cr-00251-LM

JOHNATHON IRISH

**ASSENTED-TO MOTION TO FURTHER EXTEND DEADLINE TO RESPOND  
TO GOVERNMENT'S MOTION FOR PRELIMINARY ORDER OF FORFEITURE**

Johnathan Irish, through counsel, requests that the Court further extend the deadline for him to reply to the government's motion for a preliminary order of forfeiture.

1. The defendant was convicted on a one-count indictment of being a prohibited person in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1). The indictment included a standard forfeiture provision, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), regarding firearms allegedly involved in the offense.

2. After trial, the government filed a motion for a preliminary order of forfeiture pursuant to Rule 32.2(b)(2).

3. Also after trial, the defendant filed a pro se motion for a new trial which alleged ineffective assistance of his trial counsel. That motion led the Court to replace trial counsel with undersigned counsel.

4. Undersigned counsel previously requested an extension to answer the preliminary forfeiture motion. Having reviewed the facts and procedural history of the case, counsel now seeks a further extension pending a determination of how the motion for a new trial will proceed. Counsel anticipates filing a supplement to the defendant's

motion for new trial soon and in advance of the status conference scheduled for May 28, 2020. Therefore, counsel requests to extend the deadline to reply to the government's motion for preliminary forfeiture to May 29, 2020.

5. On information and belief, the items the government seeks to forfeit remain either in evidence with the court or in the possession of government agents, such that there is no prejudice to the government.

6. The government, through Assistant United States Attorney Anna Krasinski, assents to this motion.

7. No additional memorandum is submitted because all legal authority needed to act on this request is contained herein.

WHEREFORE, the defense respectfully requests a further extension of the deadline to reply to the government's motion for preliminary forfeiture to May 29, 2020.

Date: May 4, 2020

Respectfully submitted,

/s/ Richard Guerriero  
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#### CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on the date the document was signed by me.

/s/ Richard Guerriero